

# HERMAN & WHITEAKER, LLC

DONALD L. HERMAN, JR  
GREGORY W. WHITEAKER  
KENNETH C. JOHNSON<sup>†</sup>  
ROBIN E. TUTTLE<sup>††</sup>  
CARRIE L. DEVIER<sup>†††</sup>  
CLARE C. LIEDQUIST  
SARAH L. J. ACEVES<sup>††††</sup>

<sup>†</sup>Admitted in DC and VA only

<sup>††</sup>Admitted in DC, SC and FL only

<sup>†††</sup>Admitted in SC only

<sup>††††</sup>Admitted in DC only

TEL 202-600-7272

FAX 202-706-6056

6720 B Rockledge Drive, Suite 150  
Bethesda, MD 20817

February 10, 2017

## VIA ECFS

Marlene H. Dortch, Secretary  
Federal Communications Commission  
Office of the Secretary  
445 12th Street, SW  
Washington, DC 20554

**RE: Notice of Ex Parte: WC Docket No. 10-90; WT Docket No. 10-208**

Dear Ms. Dortch:

On Thursday, February 9, 2017, Donald L. Herman, Jr., Clare Liedquist and Gregory W. Whiteaker (via telephone), on behalf of Chariton Valley Wireless Services, Farmers Telephone Company, Inc., Leaco Rural Telephone Cooperative, Inc., and Northwest Missouri Cellular Partnership (collectively the "Rural Carriers"), met with Jay Schwarz, Wireline Advisor to Federal Communications Commission ("FCC" or "Commission") Chairman Ajit Pai, to discuss the Commission's proposals for Mobility Fund Phase II ("MFII") in the above-referenced proceeding.

Mr. Schwarz provided an overview of the proposals for the phase down of existing support, eligibility requirements for MFII support, auction winner obligations and projected timelines. The Rural Carriers stressed the need for a graceful transition that provides carriers receiving frozen support sufficient time to plan for and adjust to a reduction of support if such carriers are not winning bidders for the receipt of MFII support or serve areas determined to be ineligible for support. The Rural Carriers recommended that verification of network deployment be by propagation modelling, consistent with industry standards, rather than comprehensive drive tests. Mr. Whiteaker explained that the drive testing required for verification of Mobility Fund Phase I support was unreasonably cumbersome and expensive, and diverted considerable resources away from network deployments in rural areas. The Rural Carriers also discussed the

adoption of the budget for MFII and urged the Commission to adopt a budget sufficient to preserve and advance mobile broadband services in rural areas.

Pursuant to Section 1.1206(b) of the Commission's Rules, we are filing this letter electronically in the above-captioned dockets. Please contact the undersigned if you have any questions.

Respectfully submitted,

A handwritten signature in cursive script that reads "Clare Liedquist".

Clare Liedquist

[Cl Liedquist@hermanwhiteaker.com](mailto:Cl Liedquist@hermanwhiteaker.com)

(202) 600-7271

cc Jay Schwarz (via email)  
Rachel Bender (via email)